

Exhibit G



Sarah Cohen <sarah@tomorrowlaw.com>

Thoma v. VXN et al - Stipulation for 2-Week Extension for time to File Motion to Dismiss

Sarah Cohen <sarah@tomorrowlaw.com>

Tue, Oct 3, 2023 at 11:06 AM

To: Eric Clopper <eclopper@kanelaw.la>

Cc: Brad Kane <bkane@kanelaw.la>, Chris Cude <ccude@kanelaw.la>, "jeff@tomorrowlaw.com" <jeff@tomorrowlaw.com>, "david@tomorrowlaw.com" <david@tomorrowlaw.com>, Emanuel Munguia <emanuel@tomorrowlaw.com>, Nadia Rodriguez <nadia@tomorrowlaw.com>, Rafael Yedoyan <rafael@tomorrowlaw.com>, thomavvxngroupllcetalz11731883@projects.filevine.com

Good Morning Eric,

Defendants are obligated to meet and confer in good faith at least seven (7) days prior to the filing of their anticipated motion to dismiss as to Plaintiff's First Amended Complaint ("FAC"). See Local Rule 7-3. Plaintiff's FAC was filed on September 20, 2023 and no such meet and confer has occurred nor has there been an effort by Defendants to meet and confer in good faith. Rather, Defendants continuously request extensions for meritless motions thereby causing further delay in the prosecution of Plaintiff's actions (Class, PAGA, and UCL). To date, Defendants have failed to raise any substantive issues relating to the amendments of the FAC despite discussing the amendments in detail during a telephonic meet and confer, in writing via email, and despite the fact that the FAC was filed and served almost two weeks ago. Defendants' extension request is therefore denied as Plaintiff has reason to believe that Defendants do not intend to meet and confer in good faith and that this is yet another unmeritorious motion for the sole purpose of further delaying the progress of the case.

Thank you.

[Quoted text hidden]

[Quoted text hidden]